

FILED 30 OCT '12 16:09 USDC-ORP

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA

Case No. 3:12-CR 00576-HZ

v.

INDICTMENT

THOMAS PAUL MARMARO,

18 U.S.C. § 287

Defendant.

THE GRAND JURY CHARGES

**COUNT 1
FALSE CLAIM**

On and between October 31, 2007, and November 30, 2007, in the District of Oregon, THOMAS PAUL MARMARO, defendant herein, knowingly and unlawfully made and presented to employees of the United States of America, Veterans Affairs Medical Center, a false, fictitious, and fraudulent claim for mileage reimbursement for travel from Redmond, Oregon to the Veterans Affairs Medical Center, Portland, Oregon, and return to Redmond, Oregon in Portland in the total sum of \$184.08, when in fact defendant knew no such travel took place and that the claims was false, fictitious, and fraudulent, all in violation of Title 18, United States Code, Section 287.

**COUNT 2
FALSE CLAIM**

On or about February 15, 2012, in the District of Oregon, THOMAS PAUL MARMARO, defendant herein, knowingly and unlawfully made and presented to employees of the United States of America, Veterans Affairs Medical Center, a false, fictitious, and fraudulent claim for mileage reimbursement for travel from Redmond, Oregon to the Veterans Affairs Medical Center, Portland, Oregon, and return to Redmond, Oregon, in the sum of \$119.52, when in fact defendant knew that no such travel took place to Redmond, Oregon, and that the claim was false, fictitious, and fraudulent, all in violation of Title 18, United States Code, Section 287.

**COUNT 3
FALSE CLAIM**

On or about February 17, 2012, in the District of Oregon, THOMAS PAUL MARMARO, defendant herein, knowingly and unlawfully made and presented to employees of the United States of America, Veterans Affairs Medical Center, a false, fictitious, and fraudulent claim for mileage reimbursement for travel from Redmond, Oregon, to the Veterans Affairs Medical Center, Portland, Oregon, in the sum of \$119.52, when in fact defendant knew that no such travel took place from Redmond, Oregon, to the Veterans Affairs Medical Center, in Portland, Oregon, and that the claim was false, fictitious, and fraudulent, all in violation of Title 18, United States Code, Section 287.

**COUNT 4
FALSE CLAIM**

On or about March 14, 2012, in the District of Oregon, THOMAS PAUL MARMARO, defendant herein, knowingly and unlawfully made and presented to employees of the United States of America, Veterans Affairs Medical Center, a false, fictitious, and fraudulent claim for mileage reimbursement for travel from the Veterans Affairs Medical Center, Portland, Oregon, to Redmond, Oregon, in the sum of \$119.52, when in fact defendant knew that no such travel took place to Redmond, Oregon, and that the claim was false, fictitious, and fraudulent, all in violation of Title 18, United States Code, Section 287.

**COUNT 5
FALSE CLAIM**

On or about March 19, 2012, in the District of Oregon, THOMAS PAUL MARMARO, defendant herein, knowingly and unlawfully made and presented to employees of the United States of America, Veterans Affairs Medical Center, a false, fictitious, and fraudulent claim for mileage reimbursement for travel from Redmond, Oregon to the Veterans Affairs Medical Center, Portland, Oregon, and return to Redmond, Oregon, in the sum of \$119.52, when in fact defendant knew that no such travel took place, and that the claim was false, fictitious, and fraudulent, all in violation of Title 18, United States Code, Section 287.

**COUNT 6
FALSE CLAIM**

On or about March 21, 2012, the District of Oregon, THOMAS PAUL MARMARO, defendant herein, knowingly and unlawfully made and presented to employees of the United States of America, Veterans Affairs Medical Center, a false, fictitious, and fraudulent claim for mileage reimbursement for travel from Redmond, Oregon to the Veterans Affairs Medical Center, Portland, Oregon, and return to Redmond, Oregon, in the sum of \$119.52, when in fact defendant knew that no such travel took place from Redmond, Oregon, and that the claim was false, fictitious, and fraudulent, all in violation of Title 18, United States Code, Section 287.

October 30, 2012

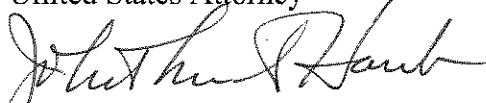
A TRUE BILL.

FOREPERSON

Presented by:

S. AMANDA MARHSAL

United States Attorney



JOHNATHAN S. HAUB

United States Attorney